



SITE INSPECTION WORK PLAN

**Globe-Union, Inc.
Garland, Dallas County, Texas
TXD980626642**



REGION 6


**Prepared in cooperation with the
U.S. Environmental Protection Agency**

February 2020

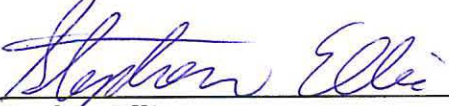
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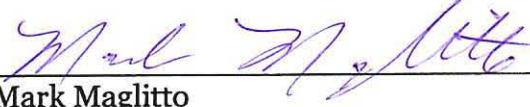
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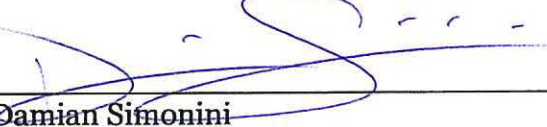
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APPENDICES

Appendix A - Health and Safety Plan

Appendix B - Quality Assurance Project Plan (Document Number QTRAK # 19-402) for the TCEQ Preliminary Assessment/Site Inspection Program

Appendix C – Preliminary Assessment Report

Appendix D – Standard Operating Procedures

1.0 INTRODUCTION

Under authority of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the Superfund Amendments and Reauthorization Act (SARA), the Texas Commission on Environmental Quality (TCEQ) has been requested by the U.S. Environmental Protection Agency (EPA) Region 6 to conduct a Site Inspection (SI) at the Globe-Union, Inc. site (TXD980626642) in Garland, Dallas County, Texas, to collect data that will be used to determine if the site is eligible for proposal to the National Priorities List (NPL) under the Federal Superfund Program.

This work plan has been prepared according to 40 Code of Federal Regulations (CFR) Part 300, Hazard Ranking System, Final Rule; the EPA Hazard Ranking System Guidance Manual; and the EPA Guidance for Performing Site Inspections Under CERCLA (Ref. 1; Ref. 2; Ref. 3).

1.1 Work Plan Overview

The purpose of this investigation is to document the release(s) or potential release(s) of hazardous substances and evaluate potential source(s) of hazardous substances. This work plan was developed using available information obtained primarily through a review of files and previous site investigations. The information collected was evaluated for data gaps and additional information needs were incorporated into this work plan.

Field work described in this work plan will be conducted in accordance with the site-specific Health and Safety Plan (HASP), the Preliminary Assessment/Site Inspection (PA/SI) Quality Assurance Project Plan (QAPP) (QTRAK # 19-402), the Preliminary Assessment (PA) Report, and applicable TCEQ Standard Operating Procedures (SOPs), included in Appendices A, B, C, and D, respectively. **Note:** The TCEQ Superfund (SF) Program SOPs listed in Appendix C of this workplan may reference other SF field activity SOPs. However, where there is conflicting language between the PASI QAPP

(including the Contract Laboratory Program (CLP) Sampler's Guide) and SF SOPs, the QAPP language will supersede SF SOP language.

1.2 Site Objectives with Respect to the Pre-Remedial Process

The pre-remedial stage of the Superfund process involves a Preliminary Assessment (PA) and an SI stage consisting of an SI and, if necessary, an Expanded Site Inspection (ESI). This SI will build upon existing data by obtaining additional background information relevant to the site through a file review and collecting environmental samples to further characterize conditions at or near the site. This SI will concentrate on documenting potential sources of hazardous substances, migration of hazardous substances to and from the site, and evidence of actual human and/or ecological exposure to hazardous substances released to the environment along the migration pathways. TCEQ personnel will perform the activities described in this work plan to provide analytical data that can be used by the EPA to rank the site using the Hazard Ranking System (HRS). This information will be presented in an SI report.

1.3 Personnel Requirements and Responsibilities

In addition to the roles and responsibilities described in Section A.4.2 of the PA/SI QAPP, the following individuals have additional responsibilities with respect to this work plan:

The TCEQ PA/SI Program Manager is responsible for identifying, assigning, and organizing the staff to execute the activities required to complete the SI, and provides technical and administrative support to the Project Manager. The TCEQ PA/SI Program Manager is responsible for reviewing and approving this work plan and the SI report.

The TCEQ PA/SI Project Quality Assurance Specialist (QAS) functions independently of the PA/SI program and ensures that project quality control is maintained. The QAS is responsible for reviewing and approving this work plan. The QAS also reviews Contract Lab Program (CLP) Environmental Services Assistance Team (ESAT) report(s) and/or

data packages generated by the EPA Region 6 Laboratory associated with this SI sampling event. The QAS provides an audit of data quality (ADQ) to the Project Manager to be included with the SI report. The project QAS identifies quality-related problems and reports them to the site Project Manager, PA/SI Program Manager, and the lead PA/SI QAS.

The TCEQ Project Manager is responsible for completing the activities described in and associated with this work plan and adhering to the sampling activities and SI report schedule.

The EPA Region 6 Site Assessment Manager (SAM) is responsible for reviewing and approving this work plan and the SI report.

1.4 Community Relations

Prior to the start of any work to evaluate the site, the TCEQ will inform appropriate local authorities of the intended sampling event. Owners of property to be accessed for site reconnaissance or sampling purposes will be contacted by letter or telephone to obtain property access and coordinate sampling dates. The TCEQ will make no other formal notifications of the SI sampling event.

The TCEQ will only access the property for sampling purposes after receiving written authorization from the property owner or their representatives. Sample results will be sent to each property owner, for their property only, upon completion of the data quality assurance process.

Any requests for information received by the TCEQ from property owners or authorities will be referred to the PA/SI Program Manager or designee for an appropriate response. Any requests for information from the news media or other parties will be directed through the TCEQ PA/SI Program Manager or designee to the TCEQ Central Office Media Relations Office.

2.0 SITE DESCRIPTION AND BACKGROUND

The following site information is taken from the PA Report prepared for the site in September 2019 (Appendix C).

2.1 Site Information

The Globe-Union, Inc. site is located at 1111 S. Shiloh Rd., approximately 2.5 miles southwest of downtown Garland, Dallas County, Texas (Figure 1). Commercial and industrial activities predominate to the north and west of the site, smaller warehouses and office space lie to the west, and various retail entities operate to the south along Shiloh Road. A large residential neighborhood lies to the east and southeast of the site (Appendix C, Figure 2). The former Globe-Union, Inc. battery facility (site) manufactured lead oxide batteries for the automobile market from the 1950s until 1995 (Appendix C, Ref. 4, p. 1; Ref. 5 p. 1; Ref. 6, p. 9; Ref. 7, p. 1). The primary onsite business currently in operation is Copier Exporter, Inc. (CEI), a refurbisher of used photo copiers which they sell to foreign buyers.

Globe-Union, Inc. (the site) was in operation for approximately 45 years and has been investigated by several state and federal agencies over the past 40 years. Globe-Union, Inc. was the original owner of the site and began work on building the facility in the mid-1950s. The facility expanded to its full extent by 1960 and has experienced three ownership changes over the years. The site is currently owned by Realm Management, LLC.

TACB records of site air emissions testing beginning in 1973 record particulate readings far below allowable limits. Early 1980s air emissions investigations by the City of Garland found that property line air testing detections were consistently below the permitted limit. TACB records note a lack of complaints or violations through the second half of the 1980s (Appendix C, Ref. 6, pp. 15, 16, 22).

An EPA Preliminary Assessment from 1982 noted no apparent issues at the facility. Wastewater from the site- up to 80,000 gallons per day- was treated to control pH before disposal to the sanitary sewer. Up to 12.5 tons per month of solid waste was disposed, which included unusable battery plates, scrap, and clothing. Disposal records were available from the Globe-Union office at the time. Investigators ultimately noted that the company “runs a very clean operation” (Appendix C, Ref. 17, pp. 1-3).

State personnel inspected the facility in June 1986, noting non-compliance on a variety of minor (non-environmental) issues which were subsequently resolved (Appendix C, Ref. 7, p. 1).

Two 10,000-gallon diesel tanks were removed from the southwest corner of the site in February 1989. Corrosion holes were observed in both tanks, and soil sampling indicated total petroleum hydrocarbon (TPH) contamination in the tank hold area. Contaminated soil was removed and disposed (Appendix C, Ref. 20, pp. 1-10). A 20,000-gallon diesel tank installed shortly thereafter was also removed in March 1995 when the site ceased operations. Samples obtained from the tank hold, pipe chase, and dispenser island found non-detectable benzene, less than 30 µg/kg BTEX (benzene, toluene, ethylene, and xylene), and less than 70 mg/kg TPH. Stockpiled backfill with 388 mg/kg TPH and non-detectable benzene was returned to the former tank hold along with 165 additional yards of clean fill and then concreted over. The State of Texas subsequently approved site closure (Appendix C, Ref. 20, pp. 11-29).

The Texas Department of State Health Services conducted a cancer cluster study in the vicinity of the site in 2018 at the request of concerned community members. Focusing on census tracts which encompass residences 1 mile to the east and approximately 1.6 miles to the south, the study found that there was no statistically significant increase in cancer rates among the nearby population (Appendix C, Ref. 21, pp. 1-9).

Bret Kendrick from the EPA and Stephen Ellis from the TCEQ visited the site on April 3,

2019. Copiers from the primary tenant at the site, CEI, are housed mainly in the central portion of the facility. As previous correspondence indicated, all equipment associated with battery production was removed when production ceased in 1995 (Appendix C, Ref. 22, p. 1). One room contains pallets of material belonging to Advanced Water Management. Remnants of a pallet painting area are evident in the northernmost section of the main warehouse (Appendix C, Ref. 8, p. 1; Ref. 9, p. 5). There is no evidence of residual contamination within the current facility or in the parking lot where the baghouses and waste staging area were formerly located (Appendix C, Ref. 11, pp. 9-15). Based on reports of potential drums discarded in the nearby creek, efforts were made to locate drums or identify any evidence of prior dumping or impaired or stressed vegetation (Appendix C, Ref. 11, pp. 9-15). Although discarded tires were evident, the stormwater retention pond located immediately west of the site and across the railroad tracks appeared to be unimpaired (Appendix C, Ref. 11, pp. 1-3).

2.2 Potential Sources

The former Globe-Union facility staged drummed waste in the parking lot on the west side of the main operations building for some unknown period of time. Although there is no past documentation of spillage in this area, the possibility remains that site runoff, which flows west away from site structures, may have transported contamination from the waste staging area to the site drainage pathway.

No specific sources associated with the site were identified during the April 3, 2019, site visit.

3.0 FIELD WORK

The tentative schedule for the planned field activities is listed in Table 1. Before work begins each day, the field team will meet off-site to conduct an initial safety briefing and review this work plan, including the intended field schedule and sampling procedures. Sample locations may be adjusted as necessary to ensure that the samples provide sufficient data to properly evaluate the site. The schedule may be adjusted as necessary to arrange meeting times with site contacts according to availability. Any deviations from the work plan will be documented in the field logbook.

Table 1. Tentative Field Schedule

Day 1	
Time	Site Activity
11:00	Arrive in Dallas and break for lunch.
12:00	Arrive at staging area. Review and sign HASP.
13:00	Collection of soil samples SO-01 through SO-05 and sediment samples SE-01 through SE-05.
17:00	End sampling; begin packaging samples for shipping. Conduct additional access search for background sample locations if needed.
18:00	Leave site to ship samples.
18:30	End of day.
Day 2	
Time	Site Activity
08:00	Arrive at staging area. Review and sign HASP.
08:30	Determine neighborhood accessibility and begin collection of soil samples SO-06 through SO-11.
12:00	Break for lunch.
13:00	Collection of soil samples SO-12 through SO-16.
17:00	End of sampling; begin packaging samples for shipping.
18:00	Leave site to ship samples.
18:30	End of day.
Day 3	
Time	Site Activity
08:00	Arrive at staging area. Review and sign HASP.
08:30	Collection of soil samples SO-17 through SO-21.
12:00	Break for lunch.
13:00	End of sampling; begin packaging samples for shipping.
17:00	Leave site to ship samples.
18:00	End of event.

3.1 Field Documentation

Photographs will be taken as required to document conditions at each sample location and other important site features. Global Positioning System (GPS) coordinates will not be collected by TCEQ staff; however, the EPA SAM may obtain GPS coordinates as they deem necessary. At each sample location, support observations will be recorded in the field logbook as described in Section A.9.3 of the QAPP.

3.2 Sampling Activities

The samples to be collected and sample rationale are described below and listed in Table 2. Proposed sample locations are indicated in Figures 2 and 3. Sample containers, preservatives, and holding times are provided in Table 3. Sample handling and custody procedures will be followed as described in Element B.3 of the QAPP. The EPA-assigned laboratory(ies) will analyze all samples collected for total metals and mercury using the Contract Laboratory Program (CLP) routine Inorganic Superfund Methods (ISM02.3).

Background samples will be collected to determine the naturally-occurring background levels of hazardous substances in unaffected off-site locations. Pathway sample results will be compared to background sample results in order to establish releases of hazardous substances and evaluate exposure to receptors. Source sample results will be compared to background sample results to determine whether the hazardous substances are attributable to the site.

3.2.1 Source Characterization

Soil samples will be collected from the potentially contaminated soil area along the site drainage pathway 0-6 or 6-12 inches (in) below ground surface (bgs), as described in Table 2, in order to characterize potential sources and evaluate whether hazardous substances have migrated from source areas. A total of four soil samples may be collected

from the contaminated soil source area, including one field duplicate sample. These samples will be collected according to Element B.2.3 of the QAPP.

3.2.2 Soil Exposure Pathway Samples

No soil exposure pathway samples will be collected during the SI.

3.2.3 Groundwater Migration Pathway Samples

No groundwater samples will be collected during the SI.

3.2.4 Surface Water Migration Pathway Samples

Soil samples (as described in Table 2) will be collected from locations along the site runoff/drainage pathway and along the banks of the nearby creek and stream that connect site runoff to Duck Creek in order to establish a release of hazardous substances and evaluate exposure to receptors along the surface water migration pathway (note: it will not be possible to collect sediment at the surface water interface because the entirety of the surface water pathway flows over limestone bedrock). A total of 21 soil samples, including 2 field duplicate samples and 3 background samples, may be collected along the overland site drainage route and the surface water pathway, which includes stream 2C4, Ruppards Branch, and Duck Creek. Soil samples will be collected and homogenized according to TCEQ SOP 6.2 (Homogenization of Soil Samples), TCEQ SOP 10.1 (Soil Sampling Using a Trowel), and Element B.2.3 of the QAPP. A background soil sample will be collected from the northwest corner of the site in an area up-gradient from potentially contaminated soil to the south. The sample will be obtained at the same depth using the same procedures as the other soil samples. Additional background soil samples will be collected from unaffected upstream areas of each surface water body using the same procedures as the other soil samples.

A total of five sediment samples, including one field duplicate, may be collected from the retention pond and associated creek runoff to the west of the facility (Figure 2). Although

the intervening railroad tracks likely prevent site runoff from reaching the retention pond, this portion of the sampling event will ensure that Globe-Union activities have not adversely affect this area. Sediment samples will be collected according to TCEQ SOP 9.1 (Sediment Sampling) and Element B.2.4 of the QAPP. It will not be possible to collect an adequate background sample for this area because there is no upstream sediment-parking lot runoff to the north and west is channeled through concrete culverts to form the pond.

3.2.5 Air Migration Pathway Samples

No air samples will be collected during the SI.

3.2.6 Quality Assurance/Quality Control Samples (QA/QC)

Three types of QA/QC field samples will be collected during this SI, including field duplicates, matrix spike/matrix spike duplicates, and temperature blanks. Table 4 summarizes the QA/QC samples and frequencies of collection.

Field duplicate samples will be collected at the rate of one field duplicate per ten samples. The field duplicate is a co-located sample collected immediately adjacent to the parent sample in soils or sediments. The field duplicate will be collected by the same sampler using the same procedure and types of sample containers used to collect the parent sample. The field duplicate should be collected from areas that are known or suspected to be contaminated. The field duplicate should also be submitted blind to the laboratory.

One matrix spike/matrix spike duplicate (MS/MSD) sample will be collected for every twenty samples per matrix. Sample volume and containers required for MS/MSD samples is specified by the CLP Regional Sample Coordinator before sampling begins. MS/MSD samples will be included in the first shipment of samples to the laboratory. MS/MSD samples are also collected from areas that are known or suspected to be contaminated.

One temperature blank will be included in each shipment cooler to ensure that samples are properly cooled during shipment. A temperature blank is a 40 mL clear glass vial filled with water and labeled "Temp Blank." Temperature blanks accompany the sample containers through collection and shipment to the laboratory, and are stored with the samples. Results of shipment temperatures will be maintained with the corresponding sample analytical data in the project file.

Table 2. Proposed Samples to be Collected

Sample ID	Sample Location	Sample Rationale
Day 1		
SE-01	Sediment (0-6 in bgs) in northeast corner of retention pond west of the site	Establish release and determine exposure to receptors
SE-02	Sediment (0-6 in bgs) in southwest corner of retention pond west of the site	Establish release and determine exposure to receptors
	MS/MSD Sample	QA/QC
SE-03	Sediment (0-6 in bgs) from stream 2C4 south of Marquis Dr.	Establish release and determine exposure to receptors
SE-04	Sediment (0-6 in bgs) from stream 2C4 south of Marquis Dr.	Establish release and determine exposure to receptors
SE-05	Field Duplicate Same as SE-04	QA/QC
SO-01	Soil (0-6 or 6-12 in bgs) located at northwest corner of the site on facility fence line	Establish background concentrations for analytes of concern
SO-02	Soil (0-6 or 6-12 in bgs) located on west side of facility fence line	Establish release and determine exposure to receptors
SO-03	Soil (0-6 or 6-12 in bgs) located on west side of facility fence line	Establish release and determine exposure to receptors
SO-04	Soil (0-6 or 6-12 in bgs) located at southwest corner of facility fence line	Establish release and determine exposure to receptors
SO-05	Field Duplicate Same as SO-03	QA/QC
Day 2		
SO-06	Soil (0-6 in bgs) from stream 2C4 bank approx. 200 feet southeast of Shiloh Rd.	Establish release and determine exposure to receptors
SO-07	Soil (0-6 in bgs) from stream 2C4 bank approx. 214 feet east of the intersection of W Miller Rd and Patton Dr	Establish release and determine exposure to receptors

SO-08	Soil (0-6 in bgs) from stream 2C4 bank behind Parkcrest Elem. School	Establish release and determine exposure to receptors
SO-09	Soil (0-6 in bgs) from stream 2C4 bank behind Parkcrest Elem. School	Establish release and determine exposure to receptors
SO-10	Soil (0-6 in bgs) from stream 2C4 bank behind Parkcrest Elem. School	Establish release and determine exposure to receptors
SO-11	Soil (0-6 in bgs) from stream 2C4 bank at [REDACTED]	Establish release and determine exposure to receptors
SO-12	Field Duplicate Same as SO-13	QA/QC
SO-13	Soil (0-6 in bgs) from stream 2C4 bank at [REDACTED]	Establish release and determine exposure to receptors
SO-14	Soil (0-6 in bgs) from stream 2C4 bank on the west side of the Sunnybrook Dr. bridge	Establish release and determine exposure to receptors
SO-15	Soil (0-6 in bgs) from stream 2C4 on the east side of the railroad tracks which run east along S Garland Ave	Establish release and determine exposure to receptors
SO-16	Soil (0-6 in bgs) from stream 2C4 bank immediately prior to confluence with Ruppards Branch	Establish release and determine exposure to receptors
Day 3		
SO-17	Soil (0-6 in bgs) from Ruppards Branch bank approximately 750 feet upstream from the confluence of Ruppards Branch and stream 2C4	Establish background concentrations for analytes of concern
SO-18	Soil (0-6 in bgs) on Ruppards Branch bank east of the confluence with stream 2C4	Establish release and determine exposure to receptors
SO-19	Soil (0-6 in bgs) from Duck Creek bank on the west side of Rick Oden Park	Establish background concentrations for analytes of concern

SO-20	Soil (0-6 in bgs) from Duck Creek bank south of Ruppards Branch and Duck Creek confluence, and located within Wynne Park	Establish release and determine exposure to receptors
SO-21	Soil (0-6 in bgs) from Duck Creek bank in Wynne Park	Establish release and determine exposure to receptors
	MS/MSD Sample	QA/QC

Table 3. Sample Containers, Preservatives, and Holding Times for Samples

Parameter	Method	Sample Container	Preservative ¹	Holding Time
Metals and Mercury	ISM02.3	Soil and sediment— One 8 oz. wide mouth glass jar with polypropylene or phenolic cap with PTFE liner.	Cool to $\leq 6^{\circ}\text{C}$, but not frozen, immediately after collection.	6 months for all metals except mercury (28 days)

¹ The term “immediately” is established as “within 15 minutes” from the time of sample collection.

Table 4. Quality Control Samples

Quality Control Sample	Frequency of Collection
Field Duplicates	1 for every 10 samples
Laboratory QC (MS/MSD)	1 for every 20 project samples
Temperature Blanks	1 per shipping cooler

3.3 Investigation Derived Waste

No Investigation Derived Waste (IDW) will be generated by this SI sampling event.

3.4 Decontamination Procedures

Proper decontamination procedures will be used to preserve the representativeness of the samples collected.

3.4.1 Equipment Decontamination Procedures

Dedicated sampling equipment will be used to collect soil and sediment samples during the SI.

To minimize cross contamination during processing and handling, the outside of each closed and custody-sealed sample container will be wiped clean with clean paper towels prior to placing the container into a clean plastic bag and bubble-wrapping it for shipment.

3.4.2 Personal Decontamination

Disposable gloves will be rendered unusable prior to disposal to prevent inadvertent reuse. These items will be disposed of in the trash.

3.5 Sample Shipping

During sampling activities, samples will be preserved as described in Table 3 and packed according to procedures described in Section B3 and Attachment 1 of the PA/SI QAPP. The Project Manager will ensure that all appropriate paperwork necessary to ship samples to the laboratories for analysis is completed. The sample handling and chain-of-custody requirements discussed in Section B3 and Attachment 1 of the PA/SI QAPP will be followed.

The chain-of-custody forms will be checked, signed, and placed in a sealable plastic bag and taped to the inside lid of the cooler. The outside of the cooler will be sealed with tamper-resistant tape which cannot be removed without tearing it. The sample custodian will sign across the seal prior to shipping the samples. In the event the shipper has to remove the cooler seal, the receiving laboratory will verify and record that the individual container, bottle, or vial sample seals are still intact.

Samples will be shipped on the same day of collection to be analyzed at an EPA-assigned laboratory. The EPA laboratory contacts are Myra Perez at 281-983-2130 or Christy Warren at 281-983-2137. Additional data handling requirements, such as daily transmission of data files, will be followed according to specific instructions received by the EPA laboratory prior to the SI.

The name, location, and last pickup time of the freight courier pickup point closest to the study area are as follows (see Figure 4):

FedEx Ship Center

3242 Herrman Dr, Garland, TX 75041

1-800-463-3339

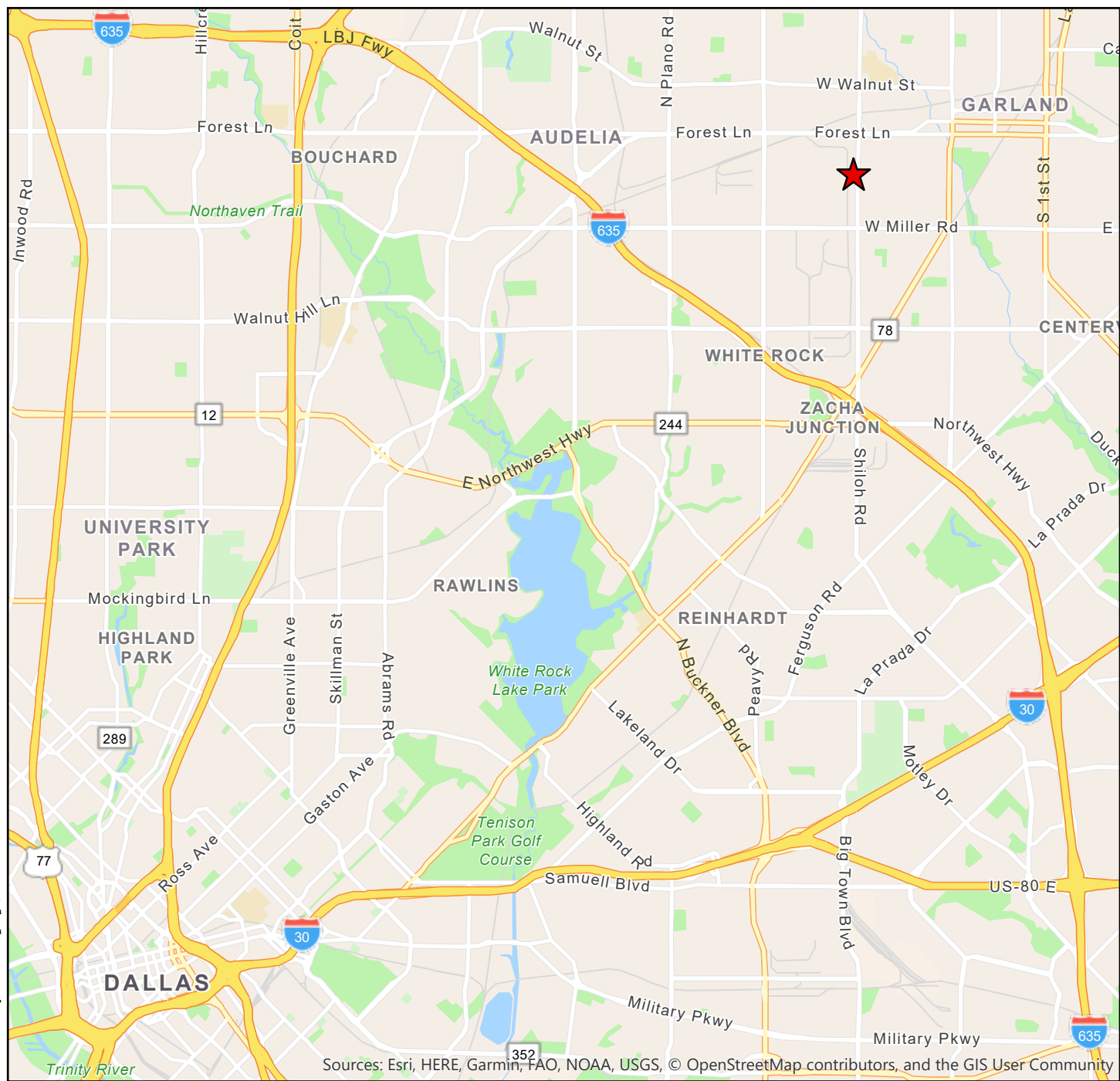
Last Pickup: 7:15 PM M-F

Figure 1: Site Location Map

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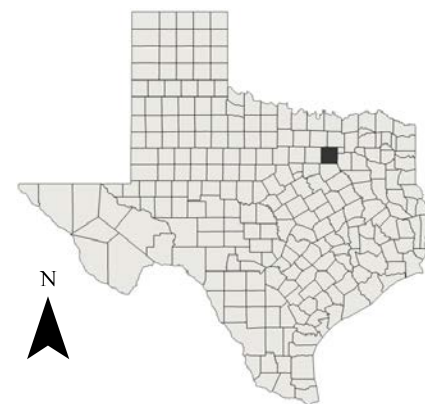
Sources: Esri, HERE, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community



Globe-Union, Inc.

1111 S Shiloh Rd.
Garland, Dallas
County, Texas

★ Site



The base map is a USGS National Topo map published by USGS. Projection: Web Mercator Auxiliary Sphere. Coordinate system: WGS 1984. This map was generated by the Remediation Division of the Texas Commission on Environmental Quality. It is intended for illustrative or informational purposes only, and is not suitable for legal, engineering, or survey purposes. This map does not represent an on-the-ground survey conducted by or under the supervision of a registered professional land surveyor. For more information concerning this map, contact the Remediation Division at 800-633-9363. Map created in January 2020.

0 1 2 3 4 5
Miles

Figure 2: Proposed Site Vicinity Sample Location Map

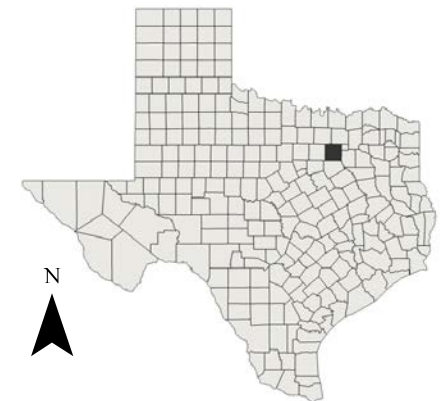


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Garland, Dallas
County, Texas

★ Site

Sample Locations

- ▲ Sediment
- Soil



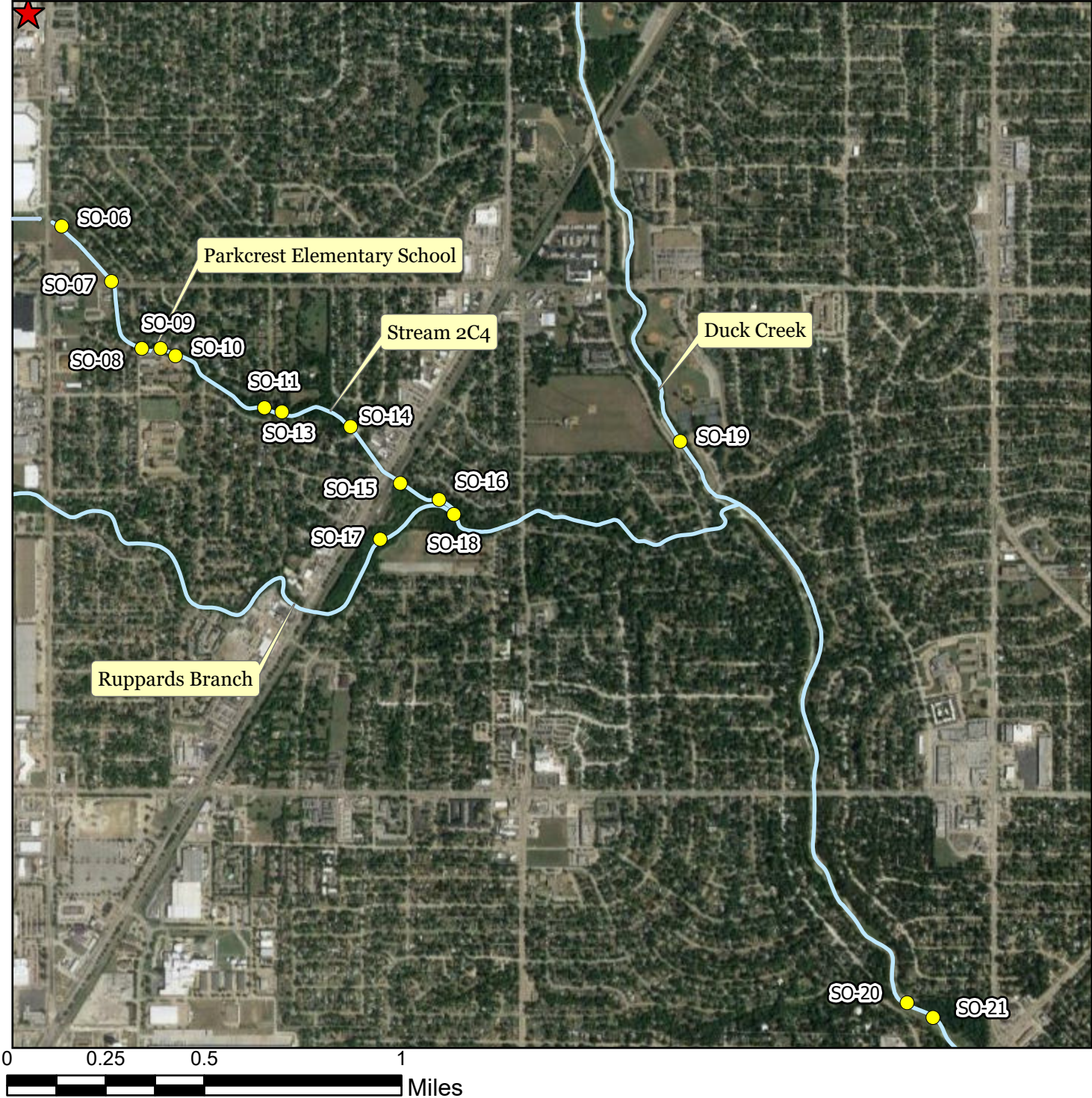
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Figure 3: Proposed Off-Site Sample Location Map

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February 2020

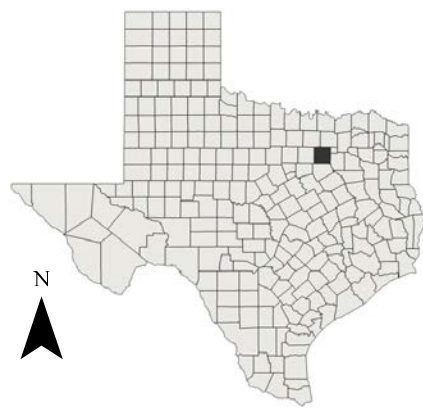
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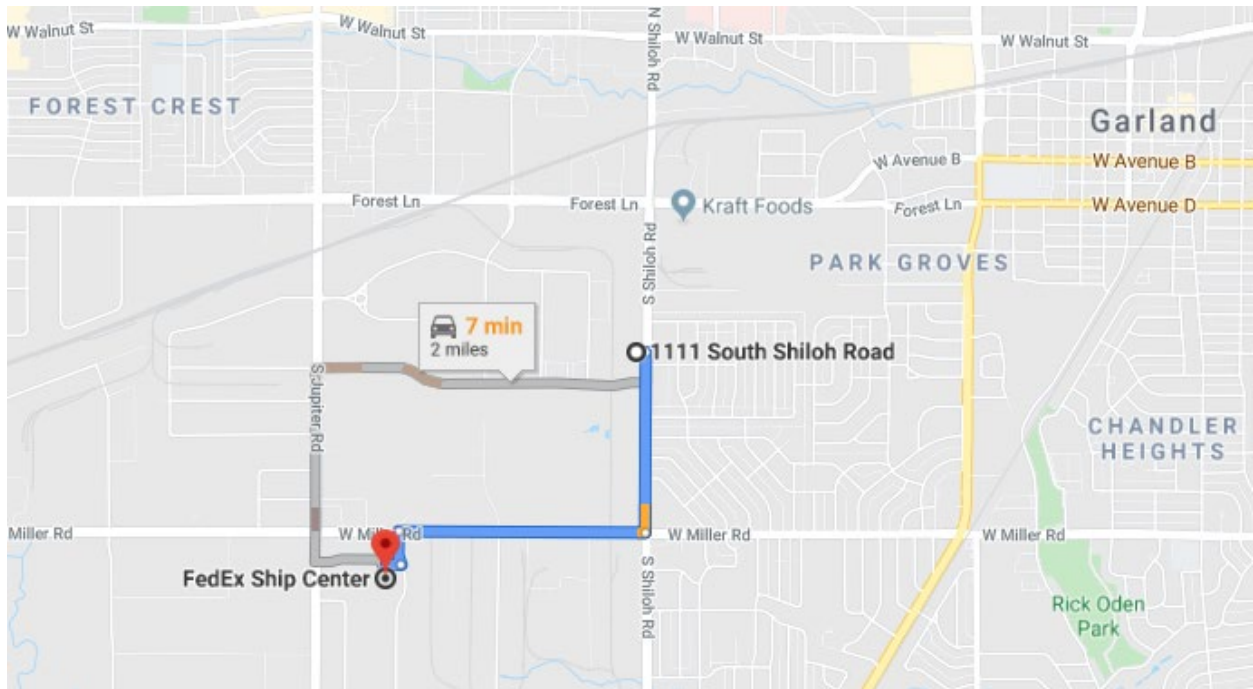
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County, Texas

- ★ Site
- Soil Sample Location



The base map is a USGS National Topo map published by USGS. Projection: Web Mercator Auxiliary Sphere. Coordinate system: WGS 1984. This map was generated by the Remediation Division of the Texas Commission on Environmental Quality. It is intended for illustrative or informational purposes only, and is not suitable for legal, engineering, or survey purposes. This map does not represent an on-the-ground survey conducted by or under the supervision of a registered professional land surveyor. For more information concerning this map, contact the Remediation Division at 800-633-9363. Map created in January 2020.

Figure 4. Map and Driving Directions from Site to FedEx



1. Head south on S. Shiloh Rd. toward Goldfinch Ln.
2. Turn right onto W. Miller Rd.
3. Turn left onto Merritt Dr.
4. Turn right and the destination will be on the left.

4.0 REFERENCES

1. U.S. Environmental Protection Agency. Federal Register - 40 CFR Part 300; Hazard Ranking System; Final Rule, Volume 55, No. 241, December 14, 1990. 135 pages.
2. U.S. Environmental Protection Agency. Hazard Ranking System Guidance Manual, EPA 540-R-92-026, OSWER Directive 9345.1-07, November 1992. 431 pages plus Appendix.
3. U.S. Environmental Protection Agency. Guidance for Performing Site Inspections Under CERCLA, Office of Emergency and Remedial Response, Hazardous Site Evaluation Division, Publication 9345.1-05, September 1992. 125 pages.